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May 31, 2023

**By ECF**

Hon. Joan M. Azrack  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re:     *United States v. James*, 22 Cr. 87 (JMA)  
Bail Modification

Dear Judge Azrack:

I represent Keith James in the above-referenced matter. It is my understanding that Mr. James's progress in the SOS program has made him eligible for removal of his ankle monitor. Accordingly, I respectfully request that Mr. James's release conditions be modified to allow for removal of the ankle monitor. Pretrial services and the government do not object to this request.

Respectfully submitted,

/s/ Dorea Silverman  
Dorea Silverman  
*Attorney for Keith James*

cc:     AUSAs Michael Gibaldi and Robert Polemini (by ECF)  
Pretrial Services Officer Amina Adossa-Ali (by email)